

1 THE HONORABLE BENJAMIN H. SETTLE  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 TODD BRINKMEYER

11 Petitioner,

12 v.

13 WASHINGTON STATE LIQUOR AND  
14 CANNABIS BOARD,

15 Respondent.

16 Case No. 3:20-cv-05661-BHS

17 **DECLARATION OF CHRIS MASSE IN  
18 SUPPORT OF MOTION FOR  
19 PRELIMINARY INJUNCTION**

20 I, Chris Masse, hereby declare and state as follows:

21 1. I am one of the attorneys representing the petitioner in this action. I am over the  
22 age of eighteen, have personal knowledge of the matters contained in the Declaration, and am  
23 competent to testify thereto.

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1       2. Attached hereto as **Exhibit A** is a true and correct copy of an email exchange I had  
2 with the Washington State Liquor and Cannabis Board on May 20, 2020. The ownership change  
3 discussed in those emails refers to Scott Atkison transferring his ownership interest in licensed  
4 marijuana retail stores to Todd Brinkmeyer.

5 *Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and*  
6 *correct to the best of my knowledge.*

7  
8 EXECUTED in Seattle, WA on this 5th day of August, 2020

9  
10 *s/ Chris Masse* \_\_\_\_\_  
11 Chris Masse

## **DECLARATION OF SERVICE**

I, Brie Geffre, hereby declare under penalty of perjury under the laws of the United States and of the state of Washington, that on this 6th day of August, 2020, I caused the foregoing to be filed using the CM/ECF system which will send notice of the same to all registered parties

SIGNED at Seattle, Washington this 6th day of August, 2020.

s/Brie Geffre  
Brie Geffre, Legal Assistant